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August 28, 2023

Via Electronic Filing

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: Letter Requesting 30-Day Extensions of Time to Answer
Plaintiffs' Complaints
B.Y.C.C., et al. v. United States, No. 22-cv-06586-MAS
J.A.L.C., et al. v. United States, No. 22-cv-06587-MAS
R.J.P., et al. v. United States, No. 22-cv-06588-MAS**

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request an additional 30 days for the United States to answer Plaintiffs' Complaints. The current date by which the United States must file its answer in each of the above-referenced cases is August 29, 2023. If the Court grants the United States' extension requests, its answers will be due on September 28, 2023. Good cause exists to grant these extensions due to the length of each Complaint and the additional time that will be needed for this Office to coordinate with and obtain the requisite approvals from other Department of Justice components before answering.

If this proposal is acceptable to the Court, I respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your consideration of these requests.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Samantha R. D'Aversa
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cc: All counsel of record
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